

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION - DETROIT

IN RE:

RICHARD ALLEN TUMBLING
AND JUDY ANN TUMBLING

CASE NO. 20-50198-MAR
CHAPTER 13
HONORABLE MARK A. RANDON

DEBTORS.

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OBJECTION TO CONFIRMATION OF DEBTORS' CHAPTER 13 PLAN

Santander Consumer USA Inc. dba Chrysler Capital as servicer for CCAP Auto Lease Ltd.

("Creditor"), for its Objection to Confirmation of Debtors' Chapter 13 Plan, states as follows:

1. The Creditor is the owner of the 2018 Jeep Compass bearing vehicle identification number 3C4NJDCB5JT212002.
2. The gross outstanding indebtedness owing to the Creditor under the terms of the Lease Agreement at the time of filing of the Bankruptcy was \$18,723.41.
3. The monthly payments under the terms of the Lease Agreement are \$318.54.
4. The Plan fails to state repayment information on the above vehicle.

5. The Lease is not current and must be current to allow payment outside the Chapter 13 Plan.

6. The Creditor requests proof of full-coverage insurance.

7. The Plan fails to provide for a prompt cure and adequate assurance of future performance as required by 11 U.S.C. § 365.

8. The lease expires January 15, 2021. All payments due under the terms of the Lease Agreement must be paid on or before that date.

In conclusion, the Creditor requests that this Court grant the relief requested and not confirm the Chapter 13 Plan until these Objections are resolved.

O'REILLY RANCILIO P.C.

/s/ Craig S. Schoenherr, Sr.

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